

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES and EXCHANGE COMMISSION,

**07 Civ. 7960 (PKC)**

Plaintiff,

Hon. P. Kevin Castel, U.S.D.J.

- against -

SMART ONLINE, INC., DENNIS MICHAEL NOURI,  
REEZA ERIC NOURI, ANTHONY MARTIN,  
JAMES DOOLAN, RUBEN SERRANO, AND  
ALAIN LUSTIG,

Defendants.

**ANSWER**

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Defendant Ruben Serrano, by his attorneys Eric W. Berry Law Office pc, for his Answer to the Complaint, alleges as follows:

1. Denies the allegations in paragraphs 2, 6, 9, 17, 25, 26, 34-38, 43-45, 47-49.
2. Admits the allegations in paragraph 15.
3. Denies knowledge or information sufficient to respond to the allegations in paragraphs 1, 3-5, 10-16, 18-20, 23, 27, 29-33 and 39-41.
4. Denies knowledge or information sufficient to respond to the allegations in paragraphs 21, 22, 24 and 28, and further denies that he was ever part of any “network” as the term is used these paragraphs.
5. Neither admits nor denies the allegations in paragraphs 7 and 8, since these paragraphs contain only assertions concerning matters of law and/or the claimed reason this case has been filed by the Securities and Exchange Commission.

6. With respect to paragraphs 42 and 46, repeats and alleges his specific responses to the respective paragraphs of the Complaint that are incorporated by reference therein.

WHEREFORE, Serrano demands judgment dismissing any and all claims, allegations and/or contentions contained in the Complaint to the extent they apply to, or are asserted against, him.

Dated: New York, New York  
November 14, 2007

Eric W. Berry Law Office pc

By: \_\_\_\_\_  
Eric W. Berry [EB8598]  
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Case No. 7960  
Civil Action

Year 2007  
Judge Castel

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Plaintiff,

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**ANSWER**

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